

BECKER & POLIAKOFF LLP

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*Attorneys for Marsha Peshkin and over 800
Other Customers of Bernard L. Madoff
Investment Securities LLC as Listed on
Exhibit A*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

SIPA LIQUIDATION

Case No. 08-01789 (BRL)

(Substantively Consolidated)

Appeal No. _____

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Declaration of Helen Davis Chaitman, dated June 30, 2011, the accompanying Memorandum of Law, and on all the proceedings heretofore had herein, Marsha Peshkin, and over 800 other customers of Bernard L. Madoff Investment Securities LLC as listed on Exhibit A to the Chaitman Declaration (the "Movants"), by their undersigned counsel, hereby move the Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined by the Court, for an Order pursuant to Federal Rules of Bankruptcy Procedure 8001(b) and 8003: (1) granting them leave to appeal the June 21, 2011 order

(Doc # 4180) of the United States Bankruptcy Court for the Southern District of New York denying the Movants' motion to compel Irving H. Picard (the "Trustee") to provide more investigative and financial information, (the "Order"), to the extent that the Order denied Movants' request for BLMIS' bank and trading records and (2) granting such other and further relief in the Movants' favor as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure 8003(a), answering papers are to be served within fourteen days after service of this motion.

June 30, 2011

BECKER & POLIAKOFF LLP

By: /s/ Helen Davis Chaitman
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